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FELLOW, AMERICAN COLLEGE OF TRIAL LAWYERS

February 13, 2022

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New
York 40 Foley Square
New York, New York 10007

Re: *Daysean Bannister: VOSR*
15 Cr. 537-26 (PAE)

Dear Judge Engelmayer:

I write on behalf of Daysean Bannister to request a modification of his living arrangements.

Mr. Bannister, whose conditions of release during the pendency of his VOSR include electronic monitoring, has been living with his mother, Taneka Bannister. Mr. Bannister reports that tensions at home are mounting and his Mom has suggested – in the strongest possible terms – that they'd both be more comfortable if he made alternative housing arrangements -- immediately. Accordingly, Mr. Bannister reached out to his childhood friend and now girlfriend, Ms. Marinelly Santiago, and she has agreed to have him reside at her home. While in her home, temporarily, Daysean has taken responsibility for walking her son to and from school, as Ms. Santiago's work conflicts with her young son's school schedule. Though he is not yet working, Daysean is contributing his monthly food stamps to help support Ms. Santiago's household.

Since the terms of Mr. Bannister's release on the pending violation require him to reside in his mother's apartment, we are writing, respectfully, to request that your Honor authorize this change of living arrangements. USPO Cosenza has expressed some reservations about this new living arrangement in light of Mr. Bannister's previous domestic violence charges in state court; however, Ms. Santiago is aware of these allegations – all of which it is counsel's understanding, have been dismissed. I have not yet reached AUSA Jordan Estes.

On another note, Mr. Bannister reports that he is actively engaged in finding employment. Last week he had three job interviews, including one at an Amazon warehouse. Additionally, Mr. Bannister has reached out to his former supervisor at

FedEx to inquire as to whether they could find work for him in NYC, as his previous employment for FedEx was in New Jersey.

Please let me know if your Honor has any questions and whether the Court will endorse this request.

Your Honor's attention to this request is greatly appreciated.

Respectfully submitted,

Susan G. Kellman
Susan G. Kellman

Cc: Jordan Estes, AUSA

Angela Cosenza, USPO

Daysean Bannister

GRANTED. The Court, having reviewed the Government's letter stating that it and the Probation Department do not oppose the proposed change in Mr. Bannister's living arrangements, approves the proposed modification to his conditions of release. The Clerk of Court is requested to terminate the motion at Dkt. No. 1693.

2/16/2022

SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge